

March 13, 2020

MEMO ENDORSED

VIA ECF and Email

Honorable Paul G. Gardephe
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

RE: *United States v. Omar Amanat*, 15 Cr. 536 (PGG) Conditions at the MCC,
Emergency Bail Application *The Government will also address in detail defendant's arguments concerning Amanat's likely sentence, and current medical condition.*

Dear Judge Gardephe:

We are writing to move the Court to grant Omar Amanat release pending his

sentence. Mr. Amanat is within the group of people the Centers for Disease Control and Prevention ("CDC") has categorized as most-at-risk for dying from COVID-19, a

dangerous illness spreading rapidly across the world, through New York State and within

New York City. We have learned that a security officer at the United States Attorneys

Office has tested positive and now the Bureau of Prisons has suspended all visits to the

MDC. 18 U.S.C. § 3143 of The Bail Reform Act provides for the release of a defendant

pending sentence. Mr. Amanat is not a flight risk and does not pose a danger to the

community. Mr. Amanat has a history of strokes and his carotid artery is blocked. People

with underlying heart and stroke conditions are at serious risk of serious illness and even

death if they contract COVID-19. Mr. Amanat was hospitalized for a stroke while

incarcerated in MCC. After a two-week period of quarantine he will be living at his

parents' home in New Jersey. We asked the government for its position on this request